

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Cases

)
)
)
) MDL No. 2419
) Dkt. No 1:13-md-2419 (RWZ)
)
)
)
)
)
)

**NOTICE OF FILING
PROPOSED AGREED ORDER
EXTENDING DEADLINE TO DEPOSE COMMON EXPERT WITNESSES
FROM MARCH 18, 2016, TO APRIL 9, 2016**

The STOPNC Defendants and the Plaintiffs' Steering Committee hereby give notice to the Court and to all parties as to the filing of their *proposed* Agreed Order Extending Deadline to Depose Common Expert Witnesses from March 18, 2016, to April 9, 2016. The proposed agreed order is attached as an exhibit to this Notice. The parties respectfully notify the Court that there is no opposition to the request made at Dkt. 2684 to extend the deadlines, and ask that the Court enter the exhibited agreed order.

Respectfully and jointly submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ Chris J. Tardio

C.J. Gideon, Jr.*

Chris J. Tardio*

Alan S. Bean**

Matthew H. Cline*

315 Deaderick Street, Suite 1100

Nashville, TN 37238

Ph: (615) 254-0400

Fax: (615) 254-0459

chris@gideoncooper.com

***Attorneys for the Tennessee Clinic
Defendants***

* Admitted pursuant to MDL Order No. 1.

** Admitted *pro hac vice*

/s/ Mark P. Chalos

Mark P. Chalos

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

150 Fourth Avenue North, Suite 1650

Nashville, TN 37219-2417

Telephone: (615) 313.9000

Facsimile: (615) 313-9965

mchalos@lchb.com

***Plaintiffs' Steering Committee and
Federal/State Liaison***

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing and copies will be e-mailed or mailed via regular U.S. mail to those participants identified as unregistered this 2nd day of March, 2016.

/s/ Chris J. Tardio